

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PASAFESHARE LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

C.A. No. 6:20-cv-00397-ADA

JURY TRIAL DEMANDED

PLAINTIFF’S UNOPPOSED MOTION FOR CONFERENCE RE: DKT. NO 246

Plaintiff paSafeShare LLC respectfully submits this unopposed Motion for Conference regarding the parties’ April 22, 2025 Joint Status Report and Request for Teleconference. Dkt. No. 246.

On April 22, 2025, the parties filed a Joint Status Report at the Court’s direction presenting each party’s position on how this case should proceed following the rulings at the March 7, 2025 pretrial conference and requesting a conference with the Court to address the Joint Status Report. On July 8, 2025, paSafeShare’s counsel contacted Microsoft’s counsel to ask if Microsoft would agree to a join this motion requesting a Court conference or whether paSafeShare could file this motion as “unopposed.” In response, Microsoft’s counsel stated it does not join the present motion but does not oppose it, and instead, defers to the Court regarding the appropriate timing of a status conference to discuss Dkt. No. 246.

Respectfully, paSafeShare is eager to hear from the Court regarding the parties’ Joint Status Report and respectfully requests the Court conference to schedule a conference at its earliest convenience to discuss how the Court would like to proceed in this case.

Dated: July 9 , 2025

Respectfully submitted,

/s/ Jason S. Charkow

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**Not admitted in Virginia*

Attorneys for Plaintiff paSafeShare LLC

CERTIFICATE OF CONFERENCE

On July 8, 2025, paSafeShare’s counsel contacted Microsoft’s counsel to ask if Microsoft would agree to a join this motion requesting a Court conference or whether paSafeShare could file this motion as “unopposed.” In response, Microsoft’s counsel stated it does not join the present motion but does not oppose it, and instead, defers to the Court regarding the appropriate timing of a status conference to discuss Dkt. No. 246.

/s/ Jason S. Charkow